

Exhibit 1

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22 to 25

<p style="text-align: right;">Page 22</p> <p>1 - WILL GRANNIS -</p> <p>2 product success role, was that an Eng role?</p> <p>3 MR. GAGE: Objection.</p> <p>4 A. The role that I was hired into was</p> <p>5 a -- I believe it was program management was</p> <p>6 the -- was the function.</p> <p>7 Q. Did it have an engineering component?</p> <p>8 A. Yes.</p> <p>9 Q. And what was that component?</p> <p>10 A. I was expected to be the subject</p> <p>11 matter expert on all Cloud technologies ranging</p> <p>12 from artificial intelligence, streaming analytics,</p> <p>13 computation, storage, networking, and to provide</p> <p>14 recommendations to the business on where we should</p> <p>15 invest our go-to market resources based on the</p> <p>16 strength -- relative strengths or weaknesses of</p> <p>17 our products.</p> <p>18 Q. Did it have a product management</p> <p>19 component?</p> <p>20 A. I -- no.</p> <p>21 Q. When you came into that role, what</p> <p>22 was your title?</p> <p>23 A. Director, and I don't -- I don't know</p> <p>24 if it was customer success, product success.</p> <p>25 It's -- I don't recall the exact title at the</p>	<p style="text-align: right;">Page 24</p> <p>1 - WILL GRANNIS -</p> <p>2 firsthand -- real firsthand experience whether it</p> <p>3 was hands-on or leadership that we would make -- I</p> <p>4 was offered to start this role up and at the time</p> <p>5 it was scoped to be a very small thing and an</p> <p>6 experimental function.</p> <p>7 Q. What was the title or descriptive</p> <p>8 title of that role?</p> <p>9 A. Director, office of the CTO.</p> <p>10 Q. Did that role include an engineering</p> <p>11 component?</p> <p>12 A. Yes, the -- eventually. So part of</p> <p>13 creating a team was -- actually was also creating</p> <p>14 the -- the features of the -- the function itself.</p> <p>15 It was a new function at Google.</p> <p>16 Q. And did that function gain a name?</p> <p>17 A. Yes.</p> <p>18 Q. And what was the name?</p> <p>19 A. The Office of the CTO was the name of</p> <p>20 the group and the function, we decided to utilize</p> <p>21 a technical job family that had been used</p> <p>22 elsewhere in Google and put it in engineering for</p> <p>23 the first time.</p> <p>24 Q. What do you mean, "put it in</p> <p>25 engineering"?</p>
<p style="text-align: right;">Page 23</p> <p>1 - WILL GRANNIS -</p> <p>2 time.</p> <p>3 Q. Do you recall what your level was?</p> <p>4 A. L 8.</p> <p>5 Q. Do you recall what job ladder that</p> <p>6 was in?</p> <p>7 A. Program management.</p> <p>8 Q. When was your start date?</p> <p>9 A. It was the end of March, '2015</p> <p>10 approximately.</p> <p>11 Q. And how long were you in that role?</p> <p>12 A. It was roughly a year.</p> <p>13 Q. And where did you go next?</p> <p>14 A. My next role was starting the office</p> <p>15 of the CTO.</p> <p>16 Q. And how did it come to be that you</p> <p>17 made a move into the office of the CTO?</p> <p>18 A. I was asked to formulate -- because</p> <p>19 of my background in enterprise technology both in</p> <p>20 startups and in large enterprises, I was asked to</p> <p>21 provide thoughts and opinions to leadership around</p> <p>22 building such a function.</p> <p>23 And at the time I was told based on</p> <p>24 high performance in the role, demonstrated</p> <p>25 knowledge of the products and, you know,</p>	<p style="text-align: right;">Page 25</p> <p>1 - WILL GRANNIS -</p> <p>2 A. Our job families can exist. So the</p> <p>3 job family that was used for the office of the CTO</p> <p>4 had certain elements that we wanted to bring</p> <p>5 across and we knew that engineering, the core of</p> <p>6 the team would be critical to have engineering</p> <p>7 skills.</p> <p>8 And so we took the features of a job</p> <p>9 that allowed for a blend of customer facing,</p> <p>10 customer impact-type work, plus engineering-type</p> <p>11 work and we put it in engineering, meaning it was</p> <p>12 in the engineering hierarchy which allow the</p> <p>13 members of the team to participate in the larger</p> <p>14 engineering organization whether that was, you in,</p> <p>15 you know, developing or in more engineering-like</p> <p>16 reviews.</p> <p>17 Q. Was -- the technical job family</p> <p>18 you -- you talked about, was that technical</p> <p>19 solutions consultant?</p> <p>20 A. Yes.</p> <p>21 Q. And so there were technical solutions</p> <p>22 consultants outside of OCTO at the time you</p> <p>23 adopted that title?</p> <p>24 A. We don't -- we don't refer to</p> <p>25 technical solutions consultant and the job family</p>

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<p>1 - WILL GRANNIS -</p> <p>2 as the title. The title is what we use like</p> <p>3 Director, Office of the CTO, but as a job family,</p> <p>4 that is -- that is what we adopted.</p> <p>5 Q. So the technical solutions consultant</p> <p>6 job family as it existed in OCTO was different</p> <p>7 than as it existed elsewhere in Google Cloud; is</p> <p>8 that right?</p> <p>9 A. Yes, there -- there was a heavier</p> <p>10 emphasis on engineering.</p> <p>11 Q. Did the function include a product</p> <p>12 management component?</p> <p>13 A. No.</p> <p>14 Q. At some point, did your job level</p> <p>15 change?</p> <p>16 A. Yes.</p> <p>17 Q. When was that?</p> <p>18 A. I don't recall exactly, but it was</p> <p>19 roughly I think between two and three years of my</p> <p>20 time in Google.</p> <p>21 Q. Was it in connection with a</p> <p>22 promotion?</p> <p>23 A. Yes.</p> <p>24 Q. Did your job role change at the time</p> <p>25 of the promotion?</p>	<p>1 - WILL GRANNIS -</p> <p>2 A. Yes, I hold that role and then my</p> <p>3 role is also combined with Brian's role.</p> <p>4 Q. And what was Brian's title --</p> <p>5 A. He was --</p> <p>6 Q. -- at the time you reported to him?</p> <p>7 A. He held two titles throughout our</p> <p>8 time; first he was head of product management when</p> <p>9 I had first reported to him and then he became the</p> <p>10 CTO while I was reporting to him.</p> <p>11 Q. And so presently what is the</p> <p>12 descriptive title that you use for your position?</p> <p>13 A. Managing Director, Office of the CTO.</p> <p>14 Q. Did you choose that title?</p> <p>15 A. I'm just thinking back to the -- the</p> <p>16 origin of how the title came up.</p> <p>17 Q. Sure.</p> <p>18 A. So managing director is a</p> <p>19 convention -- a pretty standard convention used</p> <p>20 for L 9 on the TSC -- in the TSC job family. So I</p> <p>21 don't -- I don't recall actually it being a</p> <p>22 conscious conversation between, you know, anyone.</p> <p>23 It was more of a -- with the promotion, the -- the</p> <p>24 job title came. It also reflects the nature of my</p> <p>25 role, which is the managing director of the -- the</p>
<p style="text-align: center;">Page 27</p> <p>1 - WILL GRANNIS -</p> <p>2 A. No.</p> <p>3 Q. When you -- going back to the job</p> <p>4 family piece of this, you said it allowed for</p> <p>5 participation in the engineering hierarchy. Did</p> <p>6 that include being considered part of Eng for</p> <p>7 purposes of -- of Eng conferences that Google</p> <p>8 would put together?</p> <p>9 A. Yes.</p> <p>10 Q. And participation on things like the</p> <p>11 Eng Listserv?</p> <p>12 A. Yes.</p> <p>13 Q. Who did you report to in that role?</p> <p>14 MR. GAGE: Objection.</p> <p>15 Q. In the role that you held within</p> <p>16 OCTO, who did you report to?</p> <p>17 A. I reported to Brian Stevens.</p> <p>18 Q. Are you still in that role in OCTO?</p> <p>19 A. Is -- is your question do I still</p> <p>20 report to Brian Stevens?</p> <p>21 Q. No. I'm -- I'm aware I think that</p> <p>22 Mr. Stevens has left.</p> <p>23 My question is: The job role that</p> <p>24 you held, have you continued to hold that role up</p> <p>25 till today?</p>	<p style="text-align: center;">Page 29</p> <p>1 - WILL GRANNIS -</p> <p>2 organization.</p> <p>3 Q. Okay. Are you in the -- are you in</p> <p>4 the TSC job ladder?</p> <p>5 A. I am.</p> <p>6 Q. At the time you took on the position,</p> <p>7 was there a job ladder that applied?</p> <p>8 A. When I took the position of, which</p> <p>9 position? The original --</p> <p>10 Q. When you were in OCTO, the time you</p> <p>11 took the position in OCTO had the TSC job ladders</p> <p>12 for OCTO been developed?</p> <p>13 A. No.</p> <p>14 Q. So you've had the opportunity to work</p> <p>15 with Ms. Rowe while she's been at Google, correct?</p> <p>16 A. Yes.</p> <p>17 Q. In what capacity?</p> <p>18 A. Hiring manager --</p> <p>19 MR. GAGE: Objection.</p> <p>20 A. Hiring manager, direct manager twice.</p> <p>21 Q. And as her direct manager, what has</p> <p>22 been the frequency of your interactions with her?</p> <p>23 A. As her direct manager we've had</p> <p>24 standing one-to-ones since she started at -- at</p> <p>25 Google, and then in the period of time when she</p>

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<p style="text-align: right;">Page 30</p> <p>1 - WILL GRANNIS -</p> <p>2 did not report to me I was also someone that she</p> <p>3 would come to for advice.</p> <p>4 Q. And how frequently as the direct</p> <p>5 manager did you have one-to-ones with her?</p> <p>6 A. The -- the normal schedule was every</p> <p>7 two weeks unless it was interrupted by some type</p> <p>8 of vacation, time off, other circumstances; but</p> <p>9 it's all of my direct reports and I, we have a</p> <p>10 one-to-one on a standing schedule.</p> <p>11 At -- at the beginning it was every</p> <p>12 week, then it went to every two weeks and then</p> <p>13 over time I found that many of my direct reports</p> <p>14 choose to go once a month, but generally speaking</p> <p>15 it was very frequent.</p> <p>16 Q. And were there times that you</p> <p>17 interacted outside of your normally scheduled</p> <p>18 one-to-ones?</p> <p>19 A. Yes.</p> <p>20 Q. And what would be the types of</p> <p>21 circumstances where you would interact outside of</p> <p>22 one-to-ones?</p> <p>23 A. As I recall, most of those</p> <p>24 interactions were initiated by Ulku asking me a</p> <p>25 question on a specific circumstance.</p>	<p style="text-align: right;">Page 32</p> <p>1 - WILL GRANNIS -</p> <p>2 detail, so it will probably help. OCTO, the job</p> <p>3 family as seen in the job description and in OCTO</p> <p>4 as we've described since the very beginning of the</p> <p>5 CTO office, the role consists of three main we'll</p> <p>6 call them buckets of work. There's customer work,</p> <p>7 there's influencing the platform and products, and</p> <p>8 then there is the speaking, the evangelism part.</p> <p>9 In order to create impact with the</p> <p>10 customer OCTOs are expected to help materially</p> <p>11 advance the progress of the largest brands in the</p> <p>12 world; and what I mean by that is, you know, come</p> <p>13 to Cloud, come to Google Cloud and succeed with</p> <p>14 Google Cloud.</p> <p>15 The second pillar, the engineering</p> <p>16 pillars, are expected to take their knowledge from</p> <p>17 the corporate world and what they obtain at Google</p> <p>18 and they're expected to show impact on the product</p> <p>19 road map, and this can come in a variety of</p> <p>20 fashions. Most often this means that they have</p> <p>21 championed a change that we need make to what</p> <p>22 we're building that it is accepted by the</p> <p>23 engineering, production, leadership.</p> <p>24 And the third pillar is conveying the</p> <p>25 power of our technology to the outside world</p>
<p style="text-align: right;">Page 31</p> <p>1 - WILL GRANNIS -</p> <p>2 Q. And in your interactions with her, have you found her to be professional?</p> <p>3 A. Yes.</p> <p>4 Q. Have you found her to be knowledgeable with respect to her subject area?</p> <p>5 MR. GAGE: Objection.</p> <p>6 A. As documented in performance reviews, there are three categories. You know, when you say "knowledgeable," that requires a view across the three categories of the role. There's a customer element of the role, there's an engineering element of the role, and there's an evangelism element of the role.</p> <p>7 Ulku has demonstrated as -- you know, as shown in her performance reviews she's demonstrated acumen and knowledge; significant knowledge in evangelism, knowledge of financial services and customers, but impact knowledge on the engineering pillar has been less than the average in OCTO.</p> <p>8 Q. And tell me what that means, "impact knowledge."</p> <p>9 A. What that means is the sec -- the -- if I may describe the three in a little more</p>	<p style="text-align: right;">Page 33</p> <p>1 - WILL GRANNIS -</p> <p>2 and helping create a translation between our technology and its possibilities in the context of the day; and in this way Ulku for example spent most of her time explaining the power of technology to financial services organizations and regulators, organizations like that externally.</p> <p>3 Q. So we'll come back to some of this.</p> <p>4 With respect to the second bucket, influencing the platform products and the engineering piece -- do I have that right, that's the second bucket?</p> <p>5 A. Yes.</p> <p>6 Q. Describe for me a little bit more about the engineering aspect of -- of the role, what it means to impact -- have an impact on the product road map.</p> <p>7 A. Examples of impact can range from conceiving of a design of a new product and ensuring that it's built. It can be spotting an opportunity to evolve something that we already have and make it better.</p> <p>8 And it -- I think it's critical to point out that the idea itself is only a little bit of the role, that the -- the full as, you</p>

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<p>1 - WILL GRANNIS -</p> <p>2 know, shown in and is discussed in -- in I think</p> <p>3 numerous performance reviews of Ulku, you know,</p> <p>4 the -- the critical part is making sure that the</p> <p>5 engineering changes are accepted and driven into</p> <p>6 our baseline product road map.</p> <p>7 So there's a component that's, you</p> <p>8 know, spotting something, but the much more</p> <p>9 important component is the landing of that idea in</p> <p>10 what we build.</p> <p>11 Q. And working directly with engineers</p> <p>12 on that, is that also part of the role?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. When did you start to build</p> <p>15 out the TSC ladder within OCTO?</p> <p>16 A. Within weeks of deciding that we</p> <p>17 wanted to do this and deciding that the TSC job</p> <p>18 family was the best -- was the closest fit to what</p> <p>19 we were trying to achieve.</p> <p>20 Q. Do you recall what year that was?</p> <p>21 A. Yes, it was 2016.</p> <p>22 Q. And what did you do -- well, first of</p> <p>23 all, what positions did you identify that you</p> <p>24 wanted to hire on the TSC ladder in OCTO?</p> <p>25 A. The original job description mirrored</p>	<p>1 - WILL GRANNIS -</p> <p>2 A. I don't recall there being.</p> <p>3 Q. And the technical director position,</p> <p>4 do you recall what that was -- what level that</p> <p>5 role was scoped for?</p> <p>6 A. Between Level 8 and Level 9.</p> <p>7 Q. Now, at some point after you</p> <p>8 commenced the hiring of technical directors, was</p> <p>9 the job ladder updated to reflect the ladder as it</p> <p>10 existed in OCTO?</p> <p>11 A. Yes. It -- I think it was roughly a</p> <p>12 year to a year and a half into hiring for OCTO.</p> <p>13 Q. So sometime in 2018?</p> <p>14 A. As I recall, yes.</p> <p>15 Q. Okay. Do you have the Box open?</p> <p>16 A. No, it will take me a minute to open.</p> <p>17 Q. Sure. Do you want go ahead and open</p> <p>18 that?</p> <p>19 A. Sure.</p> <p>20 Okay, I have it open.</p> <p>21 Q. And you're going to be looking for</p> <p>22 Tab 72.</p> <p>23 A. I have no items in the folder.</p> <p>24 Q. Okay. Go ahead and try to refresh.</p> <p>25 A. Okay.</p>
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<p>1 - WILL GRANNIS -</p> <p>2 the description of the categories that I've</p> <p>3 described earlier, which is techni -- we wanted to</p> <p>4 hire what we called technical directors for the</p> <p>5 office of the CTO and that job description</p> <p>6 consisted of the three activity types described</p> <p>7 earlier; the customer influence and progress, the</p> <p>8 engineering influence and progress, and the</p> <p>9 evangelism.</p> <p>10 Q. Do you recall at the time what the</p> <p>11 top level was on the TSC job ladder that you had</p> <p>12 borrowed?</p> <p>13 A. The highest -- at the time, as I</p> <p>14 recall it, the highest codified level that we</p> <p>15 could hire for was a Level 9.</p> <p>16 Q. Do you recall whether the Level 9 had</p> <p>17 its own entry in the job ladder or whether the job</p> <p>18 ladder ended at 8 plus?</p> <p>19 A. Yeah, as I recall there was less</p> <p>20 definition. Once you reached L 8 there was a</p> <p>21 general categorization of leadership on the</p> <p>22 technical solutions consultant ladder, leadership</p> <p>23 meaning 8 plus.</p> <p>24 Q. So there was no separate entry for</p> <p>25 L 8 and L 9?</p>	<p>1 - WILL GRANNIS -</p> <p>2 MR. GAGE: It just appeared for me.</p> <p>3 A. I see it now.</p> <p>4 Q. Okay. We are going to mark this as</p> <p>5 Exhibit 76 and this is the Bates number of</p> <p>6 GOOG-ROWE-00059224 through 229. When I refer to</p> <p>7 Bates numbers, I'm referring to those small</p> <p>8 numbers in the lower right-hand corner.</p> <p>9 (Whereupon, Exhibit 76 was marked at</p> <p>10 this time.)</p> <p>11 Q. Do you recognize this as an e-mail</p> <p>12 string on which some of the string you are a</p> <p>13 recipient?</p> <p>14 A. I'm reading through it now.</p> <p>15 Yes.</p> <p>16 Q. Okay. I would like you to look at</p> <p>17 the page that has the small Bates Number 226.</p> <p>18 MR. GAGE: Is that the third page of</p> <p>19 the PDF?</p> <p>20 MS. GREENE: It is.</p> <p>21 A. Okay, I see that, Page 3.</p> <p>22 Q. Okay, and do you see the entry from</p> <p>23 March 26, 2018 at 8:54 a.m.?</p> <p>24 A. I do.</p> <p>25 Q. And you -- if the writing is small,</p>

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1	- WILL GRANNIS -	1	- WILL GRANNIS -
2	Q. -- June 1st, correct?	2	take a five-minute just bathroom and water
3	A. Yes.	3	break and so let's come back at 12:40.
4	Q. Okay. So is this consistent with	4	MR. GAGE: All right.
5	your general recollection about when the TSC	5	THE VIDEOGRAPHER: Going off the
6	ladder was updated or revised to reflect how it	6	record at 12:34 p.m. Eastern.
7	operated in OCTO?	7	(Whereupon, there was a brief recess
8	A. Generally the TSC ladders been	8	in the proceedings.)
9	constantly evolving as all ladders do at Google.	9	THE VIDEOGRAPHER: We are back on the
10	All ladders are updated on a semi-frequent basis.	10	record at 12:42 p.m. Eastern.
11	Q. With respect to your prior testimony	11	Q. Okay. Mr. Grannis, can you look in
12	about when a revision of the ladder was made to	12	the Box at Exhibit 61. This document was
13	bring it more in alignment with how it operated in	13	previously marked as Exhibit 61 and has the Bates
14	OCTO, is this -- is this consistent with around	14	number GOOG-ROWE-00055477 through 479.
15	that time frame you mentioned before?	15	A. Okay, I see it.
16	A. Yes, it -- there was a constant -- we	16	Q. Do you recognize this document?
17	were constantly evolving the TSC ladders as well	17	A. Yes.
18	as SWE PM broadly speaking within Google.	18	Q. And what is this?
19	Q. I would like you now to take a look	19	A. This is a position description for
20	at the Box and you're going to be looking for Tab	20	the office of CTO technical director.
21	175.	21	Q. When -- and when you were referring
22	A. Okay, I've got it.	22	to the job description earlier, is this what you
23	Q. Actually, you know what, you can put	23	were referring to?
24	that one aside. We're not going to mark that one	24	MR. GAGE: Objection.
25	yet.	25	A. This is the external job description,
		Page 43	Page 45
1	- WILL GRANNIS -	1	- WILL GRANNIS -
2	A. Okay.	2	yes.
3	Q. At the time you were hiring into the	3	Q. And so the technical directors that
4	technical director positions, what kinds of	4	you were looking to hire, this was the external
5	candidates were you targeting?	5	job description that you -- that you used?
6	MR. GAGE: Objection.	6	A. Yes.
7	A. There were two -- I mean, the -- the	7	Q. Okay, I would like you now to close
8	role description is, you know, a really good guide	8	that out and go to Tab 43. We're going to need
9	to what we were looking for which is people who	9	just a moment to load that in.
10	had skills, knowledge, abilities, demonstrated	10	A. Okay.
11	acumen across -- you know, the ability to advance	11	MR. GAGE: What tab did you say; what
12	customers, the ability to influence engineering,	12	was the number you said?
13	and the ability to convey very complex ideas	13	MS. GREENE: It's going to be 4-3.
14	externally to instigate action. So we were	14	MR. GAGE: Oh, okay.
15	looking for the absolute best candidates we could	15	Q. I apologize for the delay. Okay,
16	find that could do those three things.	16	should be in if you want to refresh and we're
17	Q. And were you looking to find	17	going to mark this as Exhibit 78 and it has the
18	candidates with respect to the certain industries?	18	Bates number GOOG-ROWE-00017356 through 358.
19	A. That actually wasn't the intention in	19	(Whereupon, Exhibit 78 was marked at
20	hiring. We really wanted people that could cover	20	this time.)
21	these three areas and the -- the resultant	21	Q. Do you recognize this document?
22	pipeline, being able to communicate complex ideas	22	A. Yes.
23	to different organizations yielded a pipeline that	23	Q. And you're copied on this
24	included both vertical and non-vertical expertise.	24	correspondence, correct?
25	MS. GREENE: Okay. I would like to	25	A. Yes.

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1	- WILL GRANNIS -	1	- WILL GRANNIS -
2	Q. And it's from August 28th of 2017,	2	Q. Sure. The context in which you've
3	correct?	3	reviewed that, is that in relationship to your
4	A. Yes.	4	role in OCTO?
5	Q. And this is an e-mail that Melissa	5	A. Yes.
6	Lawrence had sent to some recipients. Are those	6	Q. Okay. Now, if we can go back to what
7	recipients people who you recognize as being	7	we marked as Exhibit 78 and that was Tab 43, do
8	technical directors within OCTO?	8	you have that document open again?
9	A. At the time they were, yes.	9	A. I have it.
10	Q. Okay, and this is with respect to	10	Q. Okay. So as of August 28, 2017 was
11	preparing for PERF, and does PERF refer to the	11	there a levelling guide specific for the TSC
12	performance review process?	12	ladder as it existed in OCTO?
13	A. Yes.	13	A. Not that I recall.
14	Q. And you see in Melissa's e-mail, she	14	Q. Okay. You can put that aside.
15	says "There is very little documented for L 8 plus	15	Now, in connection with hiring the
16	expectations at Google. For general levelling,	16	technical directors, were you -- were you provided
17	this is the best guide available for generic	17	with a levelling guide to assist you in that
18	engineering." Do you see that?	18	process?
19	A. Yes.	19	A. As a -- no.
20	Q. And do you know whether that was a	20	Q. Okay. I want you to look now at Tab
21	reference to the Eng level guide, the general Eng	21	175 and we're going to mark this as Exhibit 79 and
22	level guide?	22	it has the Bates number GOOG-ROWE-00019205 through
23	A. I -- I don't recall.	23	208.
24	Q. Do you recall whether the general	24	(Whereupon, Exhibit 79 was marked at
25	engineering levelling guide was something that you	25	this time.)
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1	- WILL GRANNIS -	1	- WILL GRANNIS -
2	reviewed in connection with the performance review	2	Q. Do you recognize this document?
3	process?	3	A. No.
4	A. I don't recall.	4	Q. Have you seen any document like this
5	Q. Okay. Why don't you go ahead, we're	5	before, an "L 8 Assessment-Based Interview
6	going to look at another document. We're going to	6	Questions"?
7	come back to this. If you can go back to the Box	7	MR. GAGE: Objection.
8	and look now at Tab 175.	8	A. Yes, I have seen rubric-based
9	A. Okay, I've got it.	9	interview questions before.
10	Q. I'm sorry, I keep sending you to that	10	Q. For L 8 specifically, L 8 plus
11	document and it's not the right one. I actually	11	specifically?
12	wanted you to look at Exhibit 6.	12	A. Yes.
13	A. Okay.	13	Q. Okay. Do you recall with respect
14	Q. This document was previously marked	14	to the hiring of the technical directors in
15	as Exhibit 6 and has the Bates number P001584	15	2016/early 2017 whether you were given any sort of
16	through 85. Do you recognize this document?	16	assessment-based interview questions for the L 8
17	A. It appears to be Engineering-Wide	17	plus level?
18	Levelling Guide for this year's performance	18	MR. GAGE: Objection.
19	review.	19	A. We -- yes, we utilized a -- a series
20	Q. Have you seen Engineering-Wide	20	of questions for all candidates, rubric-based
21	Levelling Guides like this in the past?	21	questions.
22	A. Yes.	22	Q. And was it the same rubric-based
23	Q. And have you seen it in connection	23	questions for all candidates?
24	with the technical directors in OCTO?	24	A. Yes.
25	A. I don't understand your question.	25	Q. Okay, give me one moment.

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50 to 53

Page 50	Page 52
<p>1 - WILL GRANNIS -</p> <p>2 Okay. So the technical directors</p> <p>3 that you were in the process of hiring in late</p> <p>4 2016/early 2017, you expected them to fit within</p> <p>5 that job description, correct?</p> <p>6 MR. GAGE: Objection.</p> <p>7 A. Are you referring to the job</p> <p>8 description earlier, the external job description?</p> <p>9 Q. Correct.</p> <p>10 A. Yes.</p> <p>11 Q. And they would all have -- were being</p> <p>12 hired for roles that would have the same types of</p> <p>13 job responsibilities, correct?</p> <p>14 MR. GAGE: Objection.</p> <p>15 A. Yes, the three pillars I referred to</p> <p>16 earlier; the customer advancement, the engineering</p> <p>17 advancement, and the evangelism.</p> <p>18 Q. Okay. So each of the candidates who</p> <p>19 were hired into this role needed to have similar</p> <p>20 skill sets to be able to meet those three pillars,</p> <p>21 correct?</p> <p>22 MR. GAGE: Objection.</p> <p>23 A. Yes.</p> <p>24 Q. And what was that skill set that</p> <p>25 would be required?</p>	<p>1 - WILL GRANNIS -</p> <p>2 A. Yes.</p> <p>3 Q. How do you define Googliness as that</p> <p>4 term is used at Google?</p> <p>5 A. I don't create a separate definition.</p> <p>6 I use the -- what we did for hiring technical</p> <p>7 directors is we look for, you know, proven</p> <p>8 methods to assess Googliness. In this case,</p> <p>9 that's -- you've highlighted here the</p> <p>10 standard-type questions which would be used when</p> <p>11 we interview.</p> <p>12 Q. Okay. I guess I'm asking something</p> <p>13 just a little bit different, which is: When you</p> <p>14 use the term, you know, their "Googliness" or are</p> <p>15 they Googley as you've heard that used and we've</p> <p>16 had other people testify about this as well,</p> <p>17 what's your understanding of what that means,</p> <p>18 Googliness?</p> <p>19 A. Googliness can comprise a range of</p> <p>20 attributes and again in looking at the -- you</p> <p>21 know, referencing Tab 175 I think it's a good</p> <p>22 example of how it isn't defined by just one</p> <p>23 characteristic, but it can be multiple</p> <p>24 characteristics. So here it shows, you know,</p> <p>25 thriving in ambiguity, caring about a team,</p>
<p>1 - WILL GRANNIS -</p> <p>2 MR. GAGE: Objection.</p> <p>3 A. Demonstrated ability to understand</p> <p>4 and advance customers usually in the form of the</p> <p>5 experience -- firsthand experiences with Cloud,</p> <p>6 Cloud migration, second engineering experience</p> <p>7 sufficient to demonstrate ability to influence</p> <p>8 engineering groups without authority, and then</p> <p>9 third demonstrated thought leadership or some form</p> <p>10 of evangelism.</p> <p>11 Q. And so as you were interviewing</p> <p>12 candidates, were you evaluating them against that</p> <p>13 skill set as to whether you should hire them?</p> <p>14 A. We were evaluating them against the</p> <p>15 standard rubric which includes four categories,</p> <p>16 three of which are represented on Tab 175 and the</p> <p>17 fourth which is role-related knowledge which is</p> <p>18 the three categories I've described.</p> <p>19 Q. You made a reference to Tab 175, so I</p> <p>20 just wanted to look at that --</p> <p>21 A. Yes.</p> <p>22 Q. -- if you have it open.</p> <p>23 A. Yeah, I -- I still have it open.</p> <p>24 Q. Perfect. So are you referring to the</p> <p>25 categories of leadership, Googliness, and GCA?</p>	<p>1 - WILL GRANNIS -</p> <p>2 challenge of status quo. There's multiple</p> <p>3 dimensions on which someone can demonstrate</p> <p>4 Googliness.</p> <p>5 Q. Are there other attributes that you</p> <p>6 would put under "Googliness," as you understand</p> <p>7 that term?</p> <p>8 A. I think humility is generally brought</p> <p>9 up.</p> <p>10 Q. Anything else?</p> <p>11 A. I think that's a pretty comprehensive</p> <p>12 list that's on the tab.</p> <p>13 Q. What -- other than the questions that</p> <p>14 you were provided, the rubric questions you were</p> <p>15 provided in the context of interviewing technical</p> <p>16 director candidates, do you -- were you provided</p> <p>17 with any other materials to assist you in that</p> <p>18 interview process?</p> <p>19 A. Yes.</p> <p>20 Q. What?</p> <p>21 A. Typically candidate's resume and any</p> <p>22 relevant background information that they had</p> <p>23 provided to help us prepare for the interview.</p> <p>24 Q. Anything else?</p> <p>25 A. Not that I recall.</p>

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54 to 57

<p style="text-align: right;">Page 54</p> <p>1 - WILL GRANNIS -</p> <p>2 Q. Do you recall whether you reviewed</p> <p>3 any Google policies or operations guides in</p> <p>4 connection with your interview of -- interviews of</p> <p>5 technical director candidates?</p> <p>6 A. Well, I and all Googlers are required</p> <p>7 to go through training in order to be</p> <p>8 interviewers.</p> <p>9 Q. And what did your training entail?</p> <p>10 A. A knowledge of the four categories I</p> <p>11 described earlier; how to take notes, how to</p> <p>12 utilize the system we call GHire which is the</p> <p>13 system of record for notes from interviews, and</p> <p>14 just general how to create time, space in a</p> <p>15 conversation to make sure there's adequate time</p> <p>16 for a candidate to answer questions and then also</p> <p>17 ask questions at the end.</p> <p>18 Q. Going back again to the 2016/20 --</p> <p>19 early 2017 time frame, had you received training</p> <p>20 with respect to implicit bias?</p> <p>21 MR. GAGE: Objection.</p> <p>22 A. I don't recall the training that I</p> <p>23 had four or five, almost six years ago, no.</p> <p>24 Q. Have you since received any training</p> <p>25 on implicit bias?</p>	<p style="text-align: right;">Page 56</p> <p>1 - WILL GRANNIS -</p> <p>2 had experience in verticals and how they might fit</p> <p>3 into the -- the organization that you were</p> <p>4 building.</p> <p>5 MR. GAGE: Objection.</p> <p>6 A. The primary goal in hiring for</p> <p>7 OCTO was to hire people that could fulfill the</p> <p>8 three -- from a role-related knowledge standpoint,</p> <p>9 the core was the three pillars that I referred to</p> <p>10 earlier that comprised the job requirements in the</p> <p>11 role-related knowledge.</p> <p>12 Q. And so if someone had deep experience</p> <p>13 in a particular vertical, is that something that</p> <p>14 was attractive to you -- to you the same as the</p> <p>15 other qualifications?</p> <p>16 A. Yes.</p> <p>17 Q. Okay, and did you identify candidates</p> <p>18 who had that depth of experience in the vertical</p> <p>19 in the process of interviewing?</p> <p>20 A. Yes.</p> <p>21 Q. And so with respect to -- who would</p> <p>22 be in that category of people who had depth of</p> <p>23 experience in a particular industry vertical?</p> <p>24 MR. GAGE: Objection.</p> <p>25 Q. I'm looking for names.</p>
<p style="text-align: right;">Page 55</p> <p>1 - WILL GRANNIS -</p> <p>2 MR. GAGE: Objection.</p> <p>3 A. Yes.</p> <p>4 Q. Okay. Now, you mentioned the term</p> <p>5 "vertical" earlier. Can you define that term for</p> <p>6 me as -- as you mentioned in the context?</p> <p>7 A. Industries; banking, healthcare,</p> <p>8 retail, media, entertainment, gaming are examples</p> <p>9 not all-inclusive.</p> <p>10 Q. And so as you were going through the</p> <p>11 interview process, did you start to identify</p> <p>12 candidates with background or experience in</p> <p>13 particular verticals?</p> <p>14 A. Yes.</p> <p>15 Q. Okay, and what can you tell me about</p> <p>16 that?</p> <p>17 MR. GAGE: Objection.</p> <p>18 A. Is -- is there something more -- I</p> <p>19 don't understand the question. It -- it seems</p> <p>20 very broad.</p> <p>21 Q. Yeah, it is a broad question because</p> <p>22 I want to understand what your thought process</p> <p>23 was --</p> <p>24 A. Okay.</p> <p>25 Q. -- around the hiring of people who</p>	<p style="text-align: right;">Page 57</p> <p>1 - WILL GRANNIS -</p> <p>2 A. I've interviewed likely over a</p> <p>3 thousand people since I came to Google.</p> <p>4 Q. Well, so I'll help. Let's focus in</p> <p>5 on people you hired. Amongst the people, the</p> <p>6 candidates that you ended up hiring, which ones of</p> <p>7 those are ones that you would say, you know, these</p> <p>8 were people -- or people who have, you know,</p> <p>9 industry-depth experience --</p> <p>10 A. Are of them.</p> <p>11 Q. -- in a particular industry?</p> <p>12 A. All of them.</p> <p>13 Q. Okay. So all of the candidates in</p> <p>14 addition to fulfilling the four -- three groups</p> <p>15 that you mentioned earlier, also had additional</p> <p>16 experience in a particular industry?</p> <p>17 A. No, I -- please me to clarify. When</p> <p>18 I think of the industry experience, I think of it</p> <p>19 as their ability to fulfill part of Pillar 1 and</p> <p>20 part of Pillar 3. Pillar 1 being the ability to</p> <p>21 influence as subject matter experts a customer.</p> <p>22 So for example if we are trying to</p> <p>23 advance a customer in retail, someone who has a</p> <p>24 retail background will likely be able to speak the</p> <p>25 language of that customer more easily. So it</p>

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Page 58	Page 60
<p>1 - WILL GRANNIS -</p> <p>2 helps them to fulfill Bucket Number 1 or Pillar</p> <p>3 Number 1 of their job and if they're very familiar</p> <p>4 in the retail industry they may be very effective</p> <p>5 in retail industry forums or thought leadership</p> <p>6 seminars or panels or things like that, which</p> <p>7 would help them fulfill Bucket Number 3.</p> <p>8 It always comes back to the -- the</p> <p>9 ability within to execute the job across those</p> <p>10 pillars.</p> <p>11 Q. So in order to be able to execute the</p> <p>12 job for Pillar 1 and for Pillar 3, a candidate</p> <p>13 would need a depth of experience in the industry</p> <p>14 that they would be targeting in Pillars 1 and</p> <p>15 Pillars 3; is that a fair summary?</p> <p>16 A. Yes.</p> <p>17 Q. So with respect to the hiring</p> <p>18 process, at what point did you make a</p> <p>19 determination as to what level a particular</p> <p>20 candidate should join Google in?</p> <p>21 MR. GAGE: Objection.</p> <p>22 A. To clarify, I didn't make level</p> <p>23 determinations.</p> <p>24 Q. Did you make leveling --</p> <p>25 A. I --</p>	<p>1 - WILL GRANNIS -</p> <p>2 the interviews for all of the candidates?</p> <p>3 A. All of the interviews for a</p> <p>4 candidate.</p> <p>5 Q. Okay, and what steps did you take in</p> <p>6 connection with making a recommendation as to what</p> <p>7 level a candidate should come in at?</p> <p>8 A. The degree to which they demonstrated</p> <p>9 experience, background, acumen across the core</p> <p>10 elements of the role, the role-related knowledge</p> <p>11 as well as the -- the three other categories;</p> <p>12 Googliness, CCA, and leadership.</p> <p>13 Q. Did you consider anything beyond what</p> <p>14 you've just described?</p> <p>15 A. No.</p> <p>16 Q. And what did you do, if anything, to</p> <p>17 document your thought process with respect to</p> <p>18 that?</p> <p>19 A. We used a system called GHire and all</p> <p>20 of my notes and recommendations are in GHire.</p> <p>21 Q. Outside of GHire, did you do anything</p> <p>22 else to document your thought process?</p> <p>23 A. Not that I recall.</p> <p>24 Q. And once you made a recommend-- well,</p> <p>25 let me back up. To whom were you making a</p>
<p>1 - WILL GRANNIS -</p> <p>2 Q. I'll let you finish.</p> <p>3 A. I -- I was just saying I don't make</p> <p>4 level determinations, but as part of the process</p> <p>5 my job was to ensure that they were -- they were</p> <p>6 qualified at the L 8 plus level, that -- their</p> <p>7 demonstrated experience, you know, I gave a</p> <p>8 recommendation along those lines.</p> <p>9 Q. Okay. So --</p> <p>10 A. We -- we call it a statement of</p> <p>11 support.</p> <p>12 Q. So assuming someone met the L 8 plus</p> <p>13 qualifications, what was your role in deciding</p> <p>14 whether they were -- or determining whether they</p> <p>15 would come in as an L 8, an L 9, or something</p> <p>16 else?</p> <p>17 A. I didn't have a role in determining.</p> <p>18 Q. Did you make a recommendation?</p> <p>19 A. Yes.</p> <p>20 Q. And at what stage did you make a</p> <p>21 recommendation?</p> <p>22 A. Once all of the interviews were</p> <p>23 complete.</p> <p>24 Q. And by that, do you mean all of the</p> <p>25 interviews for a particular candidate or all of</p>	<p>1 - WILL GRANNIS -</p> <p>2 recommendation?</p> <p>3 A. There are as I understand it two</p> <p>4 forms of review, hiring committee and then a final</p> <p>5 review; and so I was making a recommendation that</p> <p>6 would pair with recruiting's recommendation for</p> <p>7 those two sets of reviews.</p> <p>8 Q. And who made the final decision with</p> <p>9 respect to at what level a candidate would be</p> <p>10 hired?</p> <p>11 A. I don't know if -- I didn't always</p> <p>12 know. I didn't know. The review process is a</p> <p>13 closed process. I didn't know who was in that</p> <p>14 meeting.</p> <p>15 Q. Are you aware of any instances where</p> <p>16 you recommended someone to be hired as a Level 8</p> <p>17 and the ultimate determination was that they would</p> <p>18 be hired as a Level 9?</p> <p>19 A. I don't recall.</p> <p>20 Q. Are you aware of any instances where</p> <p>21 you recommended that someone be hired as a Level 9</p> <p>22 and instead they were hired as a Level 8?</p> <p>23 A. Sorry, I'm just thinking.</p> <p>24 Q. Of course.</p> <p>25 A. I -- I don't recall off the top of my</p>

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Page 62		Page 64
1	- WILL GRANNIS -	1
2	head.	2
3	Q. Are you -- do you recall any	3
4	circumstances where you were require -- or you	4
5	were asked to provide additional document --	5
6	documentation or information supporting your	6
7	recommendation?	7
8	A. No, I only recall the statement of	8
9	support.	9
10	Q. Now, at the time you were hiring	10
11	these individuals into the role it was early on in	11
12	building out the function, correct?	12
13	A. Which individuals are you referring	13
14	to?	14
15	Q. The technical directors that you	15
16	hired in late 2016/early 2017.	16
17	A. Yes, that period of time was the	17
18	beginning of the team, yup.	18
19	Q. And at that time you didn't have a	19
20	super strong sense of what distinguishes an 8 from	20
21	a 9, correct?	21
22	MR. GAGE: Objection.	22
23	A. At what point in time are you	23
24	referring to?	24
25	Q. The late 2016/early2017 time frame.	25
Page 63		Page 65
1	- WILL GRANNIS -	1
2	A. Well, the time frame matters a lot	2
3	because in the beginning -- you know, in 2016 when	3
4	we first started the team, I would -- I would	4
5	assess the first five to, you know, eight people	5
6	that were in the team, we had a little bit less of	6
7	a sense; and then as we hired more and more,	7
8	that -- the pattern clearly emerged.	8
9	Q. Who were the first five to eight	9
10	people you're referring to?	10
11	A. The first five -- roughly five, six	11
12	that we hired in 2016, so within two months of	12
13	starting the meeting I referred to earlier where	13
14	we decided that we were going to try to -- we had	14
15	a number of -- we had the beginning of external	15
16	hires and we had internal transfers as well.	16
17	Q. And so what are the names of those	17
18	five to eight individuals, do you recall?	18
19	A. Oh, I don't recall the names off the	19
20	top of my head, but I -- I -- is there -- if	20
21	there's a reference or something. I can validate?	21
22	Q. Well, let me ask you -- I'll just	22
23	give you some names and you tell me whether you're	23
24	including them in this group. Nicholas Harteau?	24
25	A. I don't think he was hired in 2016,	25
U.S. LEGAL SUPPORT		MR. GAGE: Objection.
(877) 479-2484		A. We interviewed them.
		Q. Anything beyond what you've already
		described?
		A. No.
		Q. So what was your basis for
		recommending Ms. Rowe as a level 8?

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66 to 69

		Page 66	Page 68
1		- WILL GRANNIS -	- WILL GRANNIS -
2	A.	I'd have to see the interview packet.	2 don't -- I'm looking for the date of this packet.
3	Q.	Okay. We're going to go back to the	3 Q. Sure. Well, I can say that if you
4		Box.	4 look at the end the NDA associated with it was
5	A.	Okay.	5 signed on November 14th of 2016, if that helps
6	Q.	I think I can get that up for you.	6 place it in time.
7		So we're going to be looking for Exhibit 59.	7 A. Yeah, so it appears to be roughly the
8		MR. GAGE: Is this already in the Box	8 same time.
9		or being placed there now?	9 Q. Okay. Now, I think the question
10		MS. GREENE: It's in there.	10 I had asked you was what was your basis for
11		MR. GAGE: 59?	11 recommending Ms. Rowe as a Level 8?
12		MS. GREENE: Correct.	12 So if you want to flip through this
13		MR. GAGE: Let me refresh it. It	13 document and see if it refreshes your
14		wasn't there.	14 recollection, and then that's the question I'll be
15	A.	Is this Exhibit 59?	15 asking you.
16	Q.	Correct.	16 A. Okay. Can I have a couple of minutes
17	A.	Okay.	17 to read?
18		MS. GREENE: Ken, I think there must	18 Q. Yes, please take your time.
19		be a lag on your end. I apologize for that.	19 A. Okay.
20		We'll make sure to give you plenty of time.	20 Q. So the question is, what was the
21		MR. GAGE: I think it's intentional,	21 basis for your recommendation that she be hired as
22		Cara. I think you're doing this on purpose.	22 a Level 8?
23		I don't know how, but I'm going to figure it	23 A. After reviewing this packet and again
24		out.	24 trying to, you know, work backwards in time, a
25		(Laughing.)	25 couple of things stand out.
		Page 67	Page 69
1		- WILL GRANNIS -	- WILL GRANNIS -
2		All right, I have it now.	2 On the -- on the pros, clear industry
3	Q.	Okay. We're looking at what's been	3 knowledge, ability to tie use cases which is a
4		previously marked as Exhibit 59, Bates stamped	4 term for, you know, specific type of problem in
5		GOOG-ROWE-00019097 through 146.	5 engineering that needs to be solved and the
6		So do you recognize this as Ms.	6 ability to put that in context in the industry in
7		Rowe's GHire packet?	7 which she was -- had the most experience, which
8	A.	It appears to be, yes.	8 was financial services; and strong communicator
9	Q.	Okay, and first I want to direct your	9 which would likely indicate strong communication
10		attention to the top of this document, the first	10 skills and strong ability to convey complex ideas
11		page.	11 to customers.
12		It says "This candidate is an L 8	12 On the con side, some flags around
13		Principal Technical Solutions Consultant for the	13 depth of experience, around technical ability and
14		Office of the CTO." Do you see that?	14 no clear demonstrated large-scale migration to
15	A.	I do.	15 Cloud, although, it started some preliminary
16	Q.	And then underneath it mentions two	16 activities at JPMorgan.
17		other people, Evren and Scott. Were those two	17 So those were all factors I would
18		individuals who had -- that were being hired	18 have considered in the levelling recommendation.
19		around the same time?	19 Q. If you can look at the page that
20		MR. GAGE: Objection.	20 Bates stamped 137, the last three numbers 1-3-7.
21	A.	There's no date -- I'm looking for a	21 MR. GAGE: What -- what page in the
22		date on this artifact in order to determine how	22 PDF is it, Cara?
23		close it is to the timing.	23 MS. GREENE: 41 I believe.
24		For example Evren was in late	24 MR. GAGE: Thank you. It's just
25		October, Scott was in December. I don't -- and I	25 easier to identify that way.

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70 to 73

	Page 70	Page 72
	<p>1 - WILL GRANNIS -</p> <p>2 MS. GREENE: Sure.</p> <p>3 A. 130 -- 19137?</p> <p>4 Q. Yes. The page says "Review Our</p> <p>5 Feedback"?</p> <p>6 A. Uh-huh.</p> <p>7 Q. Okay. Do you see the entry at 12:38</p> <p>8 p.m. on November 8th from yourself?</p> <p>9 A. I do.</p> <p>10 Q. And other than what is here, did you,</p> <p>11 anywhere else, self-document anything with</p> <p>12 relationship to why you were recommending a Level</p> <p>13 8?</p> <p>14 A. No.</p> <p>15 Q. Okay. Did you consider, at any</p> <p>16 point, a Level 9 for her?</p> <p>17 A. Hard -- hard to recall four years ago</p> <p>18 what my -- you know -- what I may have been</p> <p>19 considering or not.</p> <p>20 Q. So you don't remember sitting here</p> <p>21 today?</p> <p>22 A. I don't.</p> <p>23 Q. Do you recall any candidates who you</p> <p>24 hired as a Level 9 who had items in their con</p> <p>25 list?</p>	<p>1 - WILL GRANNIS -</p> <p>2 Do you know whether your own years of experience</p> <p>3 was something that Google considered in terms of</p> <p>4 your levelling?</p> <p>5 MR. GAGE: Objection.</p> <p>6 A. I do not know what anyone considered</p> <p>7 in my hiring process. They -- they didn't give me</p> <p>8 my results except to hire me.</p> <p>9 Q. So you didn't have an understanding</p> <p>10 then that your years of experience was a factor</p> <p>11 that was considered in your level, correct?</p> <p>12 MR. GAGE: Objection, asked and</p> <p>13 answered.</p> <p>14 A. I -- I -- I don't know because I</p> <p>15 wasn't the one hiring me.</p> <p>16 Q. Okay. Were you, in connection with</p> <p>17 the hiring of the candidates, provided with any</p> <p>18 sort of metrics that equated years of experience</p> <p>19 to a particular level?</p> <p>20 A. No.</p> <p>21 Q. Okay, give me just a second. I'm</p> <p>22 going to pull up a document I hadn't planned to</p> <p>23 use, but I think it will make it easier.</p> <p>24 A. Okay.</p> <p>25 Q. Okay. We're in the process of adding</p>
	Page 71	Page 73
	<p>1 - WILL GRANNIS -</p> <p>2 A. Who had -- what was the last thing?</p> <p>3 Q. With respect to candidates where you</p> <p>4 recommended a Level 9, do you recall whether any</p> <p>5 of them had items in -- you -- you did a pro and</p> <p>6 con list. I'm asking any of them have items in a</p> <p>7 con list, in the con column?</p> <p>8 A. Well, I've never interviewed --</p> <p>9 MR. GAGE: Objection.</p> <p>10 A. I've never interviewed anyone that</p> <p>11 was perfect.</p> <p>12 Q. Do you recall any Level 9 candidates</p> <p>13 you hired with particularity with respect to what</p> <p>14 their cons were?</p> <p>15 A. Again, I'd have to review the -- I'd</p> <p>16 have to review the packet.</p> <p>17 Q. With respect to the hiring of the</p> <p>18 techni -- technical directors in late</p> <p>19 2016/early2017, were you considering any of the</p> <p>20 candidates against each other with respect to</p> <p>21 levelling recommendations?</p> <p>22 A. No, it was -- I was comparing each</p> <p>23 individual to their performance and their</p> <p>24 interviews and their ability to do the job.</p> <p>25 Q. As of -- well, let me ask you this:</p>	<p>1 - WILL GRANNIS -</p> <p>2 Exhibit 2, so give it a moment to load and then</p> <p>3 you can refresh and pull that up.</p> <p>4 A. Exhibit 2?</p> <p>5 Q. Yes.</p> <p>6 A. Okay, I can see it.</p> <p>7 MS. GREENE: How about you, Ken?</p> <p>8 MR. GAGE: Not yet.</p> <p>9 Okay, I've got it.</p> <p>10 Q. Okay. You're looking at a copy of</p> <p>11 what's been previously marked as Exhibit 2 with</p> <p>12 the title "Level 8 and Level 9 Employees in Eng PM</p> <p>13 Ops" and it is a 27-page document.</p> <p>14 So I will first direct your attention</p> <p>15 to Page 3 of this document.</p> <p>16 A. Okay. I'm there.</p> <p>17 Q. And if you look at the entries for</p> <p>18 120 to 124, do you recognize those names?</p> <p>19 A. Yes.</p> <p>20 Q. And are those individuals who were</p> <p>21 hired as directors, technical directors into OCTO?</p> <p>22 A. Yes.</p> <p>23 Q. And these five individuals were hired</p> <p>24 as Level 9, correct?</p> <p>25 A. Yes.</p>

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74 to 77

	Page 74		Page 76
1	- WILL GRANNIS -	1	- WILL GRANNIS -
2	Q. And did you recommend that each of	2	believe another document. It's going to take a
3	these individuals be hired as a Level 9?	3	minute.
4	A. I'd have to see my recommendations.	4	A. Okay.
5	Q. Okay. Do you recall whether any of	5	MR. GAGE: Should I refresh now or
6	the individuals requested that they be hired as a	6	should I wait?
7	Level 9?	7	MS. GREENE: No, I'll tell you when
8	A. I don't recall that.	8	to refresh.
9	Q. Do you recall having a conversation	9	MR. GAGE: Okay.
10	with Ms. Rowe about what level she would be	10	MS. GREENE: That's okay.
11	joining as?	11	Q. Well, you know what, we'll come back
12	A. No.	12	to that in a minute. I'll ask something else
13	Q. Do you recall her asking whether	13	while we're waiting for that.
14	Level 8 was the right level for her?	14	At the time you were -- let me ask
15	A. No. What I recall, her concerns were	15	you this: How many times did you speak with Ms.
16	in other areas.	16	Rowe in connection with the hiring process?
17	Q. Do you recall conversations around	17	A. I don't recall exactly how many
18	whether or not she would be an L 8 or -- or	18	times, but certainly at least a couple, at least a
19	higher?	19	few.
20	A. I don't -- I don't recall this.	20	Q. And do you recall in any of those
21	Q. Do you recall telling her that	21	discussions discussing the potential
22	everyone was coming into the same role?	22	verticalization of financial services?
23	A. I don't recall, but that is	23	A. What do you mean by
24	definitely true that everyone was being hired for	24	"verticalization"?
25	the same role, technical directors solutions	25	Q. Is that a term that you've heard used
	Page 75		Page 77
1	- WILL GRANNIS -	1	- WILL GRANNIS -
2	consultant.	2	at Google?
3	Q. Do you recall telling her whether	3	A. I mean. Some -- some derivatives,
4	everyone was coming in at the same level?	4	you know, like creating vertical businesses or
5	A. I don't recall saying that, no,	5	creating, you know, vertical structures, go-to
6	because it wasn't true during her hiring process.	6	market, things like that, I've heard it. I've
7	I think we had already hired or were hiring,	7	heard similar things used in that context.
8	looking at hiring Evren I believe at L 9.	8	Q. Did you discuss with Ms. Rowe the
9	Q. Did you -- do you recall whether you	9	concept of the financial services vertical at some
10	told her that some were coming in as Level 8 and	10	point in the future?
11	some were coming in as Level 9?	11	A. I'm just thinking back. One of the
12	A. I don't recall --	12	areas she was interested in was potential Google
13	MR. GAGE: Objection.	13	commitment towards financial services and industry
14	Go ahead.	14	based on her strong background in that industry.
15	A. I don't recall having a levelling	15	Q. Do you recall discussing whether at
16	conversation with Ulku during the hiring process.	16	some point in the future Google might stand up a
17	Q. Okay. So, I apologize, I'm still	17	vertical for financial services?
18	going to ask the questions and it's fine if you	18	A. That was certainly a topic that she
19	don't remember.	19	and I discussed. When we discussed it, I don't
20	A. Okay.	20	recall the exact timing of it.
21	Q. Do you recall telling her that anyone	21	Q. Do you recall telling her that when
22	was being hired as a Level 9?	22	Google did stand up verticals, you believed she
23	MR. GAGE: Objection.	23	had a lot of qualifications to compete for the
24	A. No.	24	head of that vertical?
25	Q. Okay. We're going to add in I	25	A. The -- the nature of that comment

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90 to 93

Page 90		Page 92	
1	- WILL GRANNIS -	1	- WILL GRANNIS -
2	Q. Now, did there come a point in time	2	team.
3	when you considered having Ms. Rowe oversee the	3	Q. Okay. So then if you look at the
4	other technical directors with -- with vertical	4	chart, does this outline groups that were being
5	specialty in OCTO?	5	discussed?
6	MR. GAGE: Objection.	6	A. Yes, that -- that looks like one of
7	A. Sorry, I'm just thinking back. Well,	7	the options that we had drawn up.
8	as part of professional development for all of our	8	Q. And one of the -- of the options
9	OCTOs, I am always thinking about their potential	9	was -- had verticals as a group, correct?
10	to be managers.	10	A. Yes.
11	Q. Okay. We're going to look at Tab 42.	11	Q. And what -- what was verticals; what
12	MR. GAGE: Is this newly added?	12	was that referring to?
13	MS. GREENE: Yes. We'll give it a	13	A. Industries.
14	minute.	14	Q. And so these are individuals focusing
15	MR. GAGE: Does that mean it's been	15	on a particular industry; is that right?
16	placed there or is going to be placed there?	16	A. These are individuals who over the
17	MS. GREENE: It's in the -- it's in	17	course of their time in OCTO had really
18	the process of being placed.	18	demonstrated, you know, a high acumen for a
19	MR. GAGE: Okay.	19	particular industry.
20	A. Tab 42?	20	So for example Ben Wilson, energy;
21	Q. It should be in there now, yes.	21	Jim Bennett, manufacturing; Jeff Kember, media.
22	A. Okay, I got it.	22	Q. Was Ms. Rowe in that category with
23	Q. Okay. We're going to mark this as	23	respect to financial services?
24	Exhibit 80 and it has the Bates number	24	A. Yes.
25	GOOG-ROWE-00058796 through 99.	25	Q. And so would this proposal,
Page 91		Page 93	
1	- WILL GRANNIS -	1	- WILL GRANNIS -
2	(Whereupon, Exhibit 80 was marked at	2	that -- that I think it's Melissa Lawrence is
3	this time.)	3	sharing, have Ms. Rowe as the leader of that
4	Q. Just take a minute and read through	4	vertical group?
5	this.	5	A. Yes.
6	A. Uh-huh.	6	Q. Okay, and if you could go back up to
7	Okay.	7	the first group now -- the first page, I'm sorry,
8	Q. Do you recall in the August,	8	and look at the fourth paragraph where it starts
9	20 -- 2017 time frame conversations about	9	with "We would like to."
10	reorganizing OCTO?	10	A. Okay.
11	A. I do recall a conversation around	11	Q. And the last sentence there is,
12	span sometime around that time where I described	12	"There is one level inversion in the verticals
13	the -- the situation where we had I think -- I	13	group with Ulku Rowe leading the group at a L 8
14	don't recall how many people we had, but a	14	and Ben Wilson at a L 9, but we all feel that she
15	significant amount of span direct reports and we	15	is the best person for the role." Do you see
16	were looking at smart -- we were trying to think	16	that?
17	about smart ways to organize the team.	17	A. I do.
18	Q. Okay, because you had too many direct	18	Q. And, first of all, what do you
19	reports in part?	19	understand the term "inversion" to refer to?
20	A. Because we had too -- yeah, because	20	A. Inversion is a term we use when a
21	we had too many direct reports and I had too many	21	manager is at a lower level than their direct
22	direct reports and we were looking at ways to make	22	reports.
23	sure that we were covering these topics and that	23	Q. Okay. Was this a true statement,
24	we were set up in a sustainable way because we	24	that "we all feel that she is the best person for
25	were about to see a large amount of growth in the	25	the role"?

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114 to 117

Page 114	Page 116
1 - WILL GRANNIS -	1 - WILL GRANNIS -
2 Q. And we're going to mark this as	2 engineering ladder, customer and evangelism aren't
3 Exhibit 87, Bates stamped GOOG-ROWE-00060436	3 present in the pillar requirements.
4 through 437.	4 So the skills that are transferable
5 (Whereupon, Exhibit 87 was marked for	5 are engineering, but that ladder doesn't recognize
6 identification.)	6 the skills of large-customer advancement and
7 Q. And if you can look at the bottom	7 evangelism as val -- as core valuable pieces of
8 portion of that first page --	8 their job description.
9 A. Okay.	9 Q. Are there aspects of the skills that
10 Q. -- does this reflect a ladder	10 someone would have with respect to Pillars 1 and 3
11 transf -- a section around a ladder transfer for	11 in TSC that would be skills that could also be
12 Nick Harteau from the director -- the technical	12 used with respect to a manager in SWE?
13 director role to an SWE manager ladder?	13 A. The three OCTO pillars, the first and
14 MR. GAGE: Objection.	14 third pillars would be largely negligible to
15 A. Oh, I didn't write this e-mail and I	15 transfer to a SWE manager.
16 wasn't on copy, so I don't know exactly what it's	16 Q. Understood. The pillars describe the
17 in reference -- what it refers to --	17 responsibilities of the TSC, is that a fair way to
18 Q. Well --	18 characterize that?
19 A. -- but it seems the words are	19 MR. GAGE: Objection.
20 describing transfer action.	20 A. Responsibilities, skills, background,
21 Q. Okay, and is this the transfer action	21 experience necessary, yes.
22 that you were aware of with respect to Mr.	22 Q. Okay. So, for instance, thought
23 Harteau?	23 leadership might be a skill that's relevant to the
24 A. Yes, this appears to be the same	24 first and third pillars, correct?
25 transfer.	25 MR. GAGE: Objection.
Page 115	
1 - WILL GRANNIS -	Page 117
2 Q. What was the context of that	1 - WILL GRANNIS -
3 transfer; why was he being transferred?	2 A. Mostly -- mostly the third, but
4 MR. GAGE: Objection.	3 some -- somewhat in the first, yes.
5 A. He wanted to lead a production	4 Q. Okay. Do you see thought
6 engineering team, something we don't do in OCTO.	5 leadership and evangelism as interchangeable or as
7 Q. So he was being transferred from the	6 different -- different things?
8 technical director Eng role into an SWE Eng role?	7 MR. GAGE: Objection.
9 MR. GAGE: Objection.	8 A. They are slightly different skills.
10 A. I'm -- I'm just reading this again	9 Thought leadership is the ability to take a
11 just cause I -- I've never seen this before.	10 situation, use experience, knowledge, what you
12 Yes, TSE to SWE manager.	11 learn and be able to advance a -- a situation or
13 Q. And did you support this transfer?	12 an area that quite often others don't believe or
14 A. Yes.	13 don't agree with. Evangelism is purely the act of
15 Q. And did you view his skills in TSC as	14 communicating externally on behalf of something.
16 transferrable to SWE?	15 Q. Okay. We looked earlier at that
17 MR. GAGE: Objection.	16 engineering levelling guide --
18 A. Some of them.	17 A. Uh-huh.
19 Q. And what skills are transferable?	18 Q. -- do you recall that?
20 A. It's more about the -- it's more	19 A. I do.
21 about the job family, and let me explain. The job	20 Q. With -- with respect to the items
22 family -- technical solutions consultant, we	21 that were contained on the engineering levelling
23 described earlier the three pillars of this role.	22 guide, and if you need to we can go back to that
24 The pillars are customer, evangelism, and	23 document, but is it your understanding that those
25 engineering. In the SWE ladder, software	24 items are items that apply both to TSCs and to
	25 SWEs?

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118 to 121

	Page 118		Page 120
1	- WILL GRANNIS -	1	- WILL GRANNIS -
2	MR. GAGE: Objection.	2	9 in SWE?
3	A. Somewhat, but that's also why we have	3	MR. GAGE: Objection. Someone in
4	job families that are more descriptive in terms of	4	particular?
5	requirements.	5	MS. GREENE: No, I asked about the
6	Q. I want to make sure I'm directing	6	role.
7	you, give me one moment. Okay, let's go back and	7	MR. GAGE: Oh, you used the word
8	look at that. It's Exhibit 6.	8	"someone," that's why I -- I asked the
9	A. Okay.	9	question.
10	MR. GAGE: Is this already there	10	Q. The attributes of someone in that
11	or --	11	role.
12	MS. GREENE: It's there.	12	A. In the SWE manager role?
13	MR. GAGE: Exhibit 6, Adam Lief, this	13	Q. Correct, at a Level 8 or 9.
14	one?	14	A. I think generally speaking, you know,
15	MS. GREENE: Yes.	15	we would expect to see things like this at those
16	A. I have it up.	16	levels.
17	Q. Okay. If we can look at the	17	Q. Okay. You can put that aside.
18	last -- Page 2, the entries for Level 8 and Level	18	A. Okay.
19	9, are there any entries there that you would say	19	Q. Do you know who Ben Wilson is?
20	do not apply to technical directors?	20	A. I do.
21	MR. GAGE: Objection.	21	Q. And he's also -- his full name is I
22	A. And was the question are there any	22	think Benjamin Wilson; is that right?
23	that don't explicitly apply?	23	A. Yes.
24	Q. That you would say well, this isn't	24	Q. Okay, and he -- is he someone also
25	relevant with respect to the TSC ladder or roles.	25	whom you hired into the technical director in
	Page 119		Page 121
1	- WILL GRANNIS -	1	- WILL GRANNIS -
2	A. None that immediately jump out as	2	OCTO?
3	defined.	3	A. Yes.
4	Q. Okay, and with respect to a SWE, are	4	Q. Do you know who Jonathan Donaldson
5	there any here that you would say as far as you	5	is?
6	understand the role of SWE do not apply to SWE?	6	A. Yes.
7	MR. GAGE: Objection.	7	Q. Is he another person who you hired
8	A. In the category of leadership, I	8	into the technical director position in OCTO, that
9	think that these would -- these would apply.	9	position we saw in the job description we looked
10	Q. Okay. Well, just so I'm clear: If we	10	at earlier?
11	go all the way back up to Page 1, there's four	11	A. Yes.
12	levelling criteria; knowledge and experience,	12	Q. What about Paul Strong, do you know
13	complexity and scope, leadership and influence,	13	who he is?
14	and organizational impact. Do you see that?	14	A. Yes.
15	A. I do.	15	Q. Is he someone else you hired as a
16	Q. Okay. So with respect to Levels 8	16	technical director within OCTO?
17	and 9, do each of those categories in this	17	A. Yes.
18	document apply to SWE?	18	Q. And I -- I still have not figured out
19	A. Well, it says just up in the header	19	how to say his name, Evren Eryurek?
20	"It's not a representation of expectations for any	20	A. Eryurek.
21	specific ladder," so I think the answer is no.	21	Q. Yes. Is he another person that you
22	Q. So I'm asking you based on what you	22	hired in as a technical director within OCTO?
23	know about the SWE role and as you've observed it	23	A. Yes.
24	in operation, do these generally describe	24	Q. Now, at some point did Evren transfer
25	attributes of someone at the Level 8 and/or Level	25	to a PM ladder?

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122 to 125

Page 122	Page 124
1 - WILL GRANNIS -	1 - WILL GRANNIS -
2 A. When he left OCTO he went into a 3 probationary product management role, that's 4 correct.	2 Q. Okay. If you want to look at Tab 3 73 -- oh, actually, don't look at it yet. I 4 apologize.
5 Q. PM stands for Product Management? 6 A. Yes.	5 MS. GREENE: Ken, if you want to look 6 at Tab 73.
7 Q. So he had skills that were 8 transferable from TSC to PM?	7 MR. GAGE: You just have to speed up 8 the transmission to me, Cara, they're still 9 slow in coming to me. I don't know why. And 10 my son is not home from school yet, so I know 11 it's not the video games he plays that are 12 eating up the bandwidth.
9 A. That's why he was put in a 10 probationary period, was to determine whether that 11 was true or not.	13 Okay 73, you said?
12 Q. And do you know the outcome of that?	14 MS. GREENE: Yes.
13 A. He's a product manager today, so...	15 MR. GAGE: Go ahead.
14 Q. Okay, and with respect to the 15 engineering levelling guide that we looked at a 16 bit ago with respect to Levels 8 and 9 in those 17 four different categories for the PM manager role 18 as you observed it at Google, do these descriptors 19 apply to that ladder?	16 Q. Okay. If you can take a look at 17 this document, we're going to Bates stamp this as 18 Exhibit 88 -- Bates -- I'm sorry, we're going to 19 mark it as Exhibit 88, Bates stamp 20 GOOG-ROWE-00059393 through 442.
20 A. Generally, yes, but again as states 21 in the doc it doesn't represent the specific 22 expectations for any job role including PM, SWE, 23 or TSC.	21 (Whereupon, Exhibit 88 was marked for 22 identification.)
24 Q. Right. This is an Engineering-Wide 25 Levelling Guide?	23 Q. So if you look in the upper 24 right-hand corner of this first page and read that 25 and tell me if it ref -- refreshes your
Page 123	Page 125
1 - WILL GRANNIS -	1 - WILL GRANNIS -
2 A. Yeah, this is -- yeah, there's an 3 engineering category of jobs and then the job 4 families, so this is for an engineering category 5 of jobs.	2 recollection about what level she was being 3 proposed for.
6 Q. So this is the -- the broader set and 7 then an individual ladder may have its own levels 8 defined as well, correct?	4 A. Yes.
9 A. Yes.	5 Q. Okay, and how does it refresh your 6 recollection; what do you recall?
10 Q. And so earlier we looked at this when 11 we discussed the TSC ladder itself was well, 12 correct?	7 A. Oh, okay. L 9.
13 A. Yes.	8 Q. Okay, and do you recall whether you 9 made a recommendation with respect to her level?
14 Q. All right. Do you know a woman or 15 aware of a woman named [REDACTED]?	10 A. I did. I submitted a statement of 11 support as I do for all candidates we hire.
16 A. Yes.	12 Q. Okay, and looking at Ms. Walsh and 13 her education, do you know whether a Master of 14 Arts and/or a Bachelor of Arts are positions 15 that -- are degrees that Google would consider 16 relevant to the position for which you were 17 hiring?
17 Q. And how are you aware of her?	18 MR. GAGE: Objection.
18 A. She was being considered for a role 19 in OCTO.	19 A. I can't put myself in the position of 20 determining what Google would assess or not 21 assess. I can tell you as a hiring manager we 22 look at a range of characteristics in the person's 23 background, including practical experience and 24 education.
20 Q. And was she offered a role?	25 Q. Do you -- have you seen any Google
21 A. She was.	
22 Q. And do you recall at what level she 23 was offered a role?	
24 A. I think it was L 9, but I'm not a 25 hundred percent sure.	

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130 to 133

	Page 130	Page 132
1	<p style="text-align: center;">- WILL GRANNIS -</p> <p>2 Q. Okay. We're going to mark this as 3 Exhibit 89 and you can go ahead and open it now, 4 Tab 78 and we're going to mark this as 5 GOOG-ROWE-00059503 through 508.</p> <p>6 (Whereupon, Exhibit 89 was marked at 7 this time.)</p> <p>8 Q. Okay. I would like you to turn first 9 to the third page of this document, the one with 10 the chart on it.</p> <p>11 A. Yes.</p> <p>12 Q. Do you recall receiving this chart?</p> <p>13 A. I -- I mean, I don't remember every 14 chart I've been sent, but it looks like it was 15 sent to me from [REDACTED]. It appears --</p> <p>16 MR. GAGE: Objection.</p> <p>17 A. It appears from the e-mail it's been 18 appended into a note she sent to me.</p> <p>19 Q. Do you have any understanding of how 20 this package compared to packages that were 21 offered to men in OCTO at the Level of 9?</p> <p>22 MR. GAGE: Objection.</p> <p>23 A. No, I -- and as I mentioned earlier, 24 I usually don't see the offers themselves. This 25 is highly unusual when a candidate sends me their</p>	<p>1 - WILL GRANNIS -</p> <p>2 as Exhibit 90, Bates stamped GOOG-ROWE-00056473 3 through 76.</p> <p>4 (Whereupon, Exhibit 90 was marked for 5 identification.)</p> <p>6 Q. If you can, first look at the second 7 page of this document.</p> <p>8 A. Second page?</p> <p>9 Q. Yes.</p> <p>10 A. Okay.</p> <p>11 Q. And I would like you to look at the 12 bottom half of your e-mail from May 29, 2018.</p> <p>13 A. Okay.</p> <p>14 Q. Do you see where you say "PLs; DR."</p> <p>15 A. Yes.</p> <p>16 Q. What is that?</p> <p>17 A. It's an abbreviation in computer 18 science. We use it to say too long, didn't read. 19 It's like a summary statement.</p> <p>20 Q. And what was too long that you didn't 21 read?</p> <p>22 A. Yeah, in -- in case people don't want 23 to read the entire thing. That's kind of the 24 summary of it.</p> <p>25 Q. Got it. And your summary, is that it</p>
1	<p style="text-align: center;">Page 131</p> <p>2 - WILL GRANNIS -</p> <p>3 offer.</p> <p>4 Q. Okay. If you go to page -- the first 5 page of this document. You write, "I agree. I 6 also know that every woman who came to 7 Google/OCTO, [REDACTED], Ulku, have told me they feel 8 like they didn't fight hard enough for 9 themselves," signed one. At the time you made 10 that statement, was that a true statement?</p> <p>11 A. Yes.</p> <p>12 Q. Okay, and then with respect to the 13 next paragraph you write, "This is also the Number 14 1 area where women ask for my advice/mentoring 15 respectfully fighting for what they think is fair 16 comp." Was that also a true statement at the time 17 you made it?</p> <p>18 A. Yes.</p> <p>19 Q. You can put that aside and I next 20 would like you to look at Tab 79.</p> <p>21 MS. GREENE: Does everyone have that 22 up?</p> <p>23 MR. GAGE: Not yet.</p> <p>24 A. I've got it.</p> <p>25 MR. GAGE: Go ahead.</p> <p>Q. All right. We're going to mark this</p>	<p style="text-align: center;">Page 133</p> <p>1 - WILL GRANNIS -</p> <p>2 was what?</p> <p>3 A. Not intervening.</p> <p>4 Q. Rachel Quirk writes at 10:20 a.m., "I 5 agree with Will completely. [REDACTED]'s last response 6 to escalate to Diane Greene and Brian Seaman is 7 not Googley. " Do you see that?</p> <p>8 A. Yes.</p> <p>9 Q. Do you agree that that was not 10 Googley of her?</p> <p>11 A. Yeah, -- I don't know that I -- I 12 don't know that I'd frame it as Googley or not 13 because we have a pretty strict rubric for 14 Googley or a pretty defined rubric that we went 15 over earlier, but I think it exercised poor 16 judgment.</p> <p>17 Q. Okay. If you can, go back to the 18 first page now.</p> <p>19 A. Okay.</p> <p>20 Q. Rachel Quirk at the bottom shares 21 Diane's response. Do you see that?</p> <p>22 A. Yes.</p> <p>23 Q. And is that referring to Diane 24 Greene?</p> <p>25 A. I didn't write the e-mail. I can't</p>